

Gonzalez, Larry

From: Gonzalez, Larry
Sent: Wednesday, April 08, 2015 2:42 PM
To: 'Wilbur, Emily'
Subject: RE: Questions for the April 13 call

I started to develop responses that I was appending to the questions to send to OAQPS . Didn't notice that the response to you included the first question draft. Oops.

From: Wilbur, Emily [mailto:emily.wilbur@dnr.mo.gov]
Sent: Wednesday, April 08, 2015 2:06 PM
To: Gonzalez, Larry
Subject: RE: Questions for the April 13 call

Hi Larry,

Just wondering if the type in blue (in question 1) was meant for me. It was the only question with an answer... If it was meant for me, I have a follow up. If the area is designated nonattainment, then I think I understood your answer to say that the area won't be subjected to the DRR. However, I still have a question about if the area is designated attainment based on actual emissions. Will they then be subjected to the ongoing verification requirements under the DRR in future years? I appreciate your feedback!

Thanks,
Emily

From: Gonzalez, Larry [mailto:gonzalez.larry@epa.gov]
Sent: Wednesday, April 08, 2015 1:39 PM
To: Wilbur, Emily
Subject: RE: Questions for the April 13 call

Thanks Emily – I think I understand them.

From: Wilbur, Emily [mailto:emily.wilbur@dnr.mo.gov]
Sent: Tuesday, April 07, 2015 2:39 PM
To: Gonzalez, Larry
Cc: Bhesania, Amy; Tapp, Joshua; Jay, Michael; Vit, Wendy; Randolph, Bob; Keas, Ashley; Leath, Mark
Subject: Questions for the April 13 call

Larry,

Here is a list of questions we would like to discuss on our scheduled call next Monday April 13. Let me know if you would like to discuss beforehand, or if we need to provide any clarifications.

1. Will the sources affected by the consent decree be subjected to the requirements of the final SO₂ data requirements rule (expected to be promulgated this summer)? Specifically, if these sources model attainment based on actual emissions and are designated attainment, will they be subjected to ongoing attainment verification requirements in future years? Not associated with making any kind of new designation... Areas containing phase I sources (jointly identified by the EPA and plaintiffs prior to signing the CD) will be assessed and designated based on any data and analysis (meeting our quality and

TADs specifications) provided EPA. Following designation states will submit attainment plans or maintenance plans for the areas designated. While individual sources considered or analyzed in a phase I designation may later be analyzed again in phase II or III designations as a contributing source to a new area requiring designation, the area the source is located will have already been designated.

2. If a source affected by the consent decree wanted to take a limit to avoid a nonattainment designation, when would the enforceable limit need to be effective, and when would compliance with such a limit be required to begin? *Before ideally immediately!*
3. What role, if any, is EPA expecting Missouri to take in regards to the designations of sources located in neighboring states?
 - a. Are neighboring states expected to model interactive sources that are located in Missouri? *where appro.*
 - b. EPA listed four sources in neighboring states that may be impacting Missouri. How were these sources identified as impacting Missouri? Does the listing of these sources in Missouri's letter have any impact on future SIP requirements for Missouri, such as infrastructure SIP (good neighbor provisions)? *Within 20 mi. radius of source. Not at this time*
4. Could planned controls that are being installed to comply with MATS, CSAPR, or another federal requirement be considered in a state model when recommending boundary designations? *yes*
5. According to a January 2015 press release on KCP&L's website, two coal-fired units at their Sibley generating station, both greater than 5 MW, will cease burning coal by 2019. Does this mean that the Sibley generating station meets the definition of *Announced for Retirement* per the consent decree? If not, could a planned retirement that does not meet the definition of *Announced for Retirement* be considered in a state model when recommending boundary designations? *Not sure what it mean? Closing a source until about 2019 for Sibley.*

Please let me know if you have any questions. Look forward to the call.

Thanks,

Emily Wilbur
State Implementation Plan Unit Chief
Air Pollution Control Program
(573) 751-4817 general
(573) 751-7725 direct line
(573) 751-2706 FAX

Promoting, Protecting and Enjoying our Natural Resources. Learn more at dnr.mo.gov.

*what individual state enforceable, factually &
or when.*

*816-540-3161 central
Dr Griffith*

TADs specifications) provided EPA. Following designation states will submit attainment plans or maintenance plans for the areas designated. While individual sources considered or analyzed in a phase I designation may later be analyzed again in phase II or III designations as a contributing source to a new area requiring designation, the area the source is located will have already been designated.

2. If a source affected by the consent decree wanted to take a limit to avoid a nonattainment designation, when would the enforceable limit need to be effective, and when would compliance with such a limit be required to begin? *Before ideally immediately!*
3. What role, if any, is EPA expecting Missouri to take in regards to the designations of sources located in neighboring states?
 - a. Are neighboring states expected to model interactive sources that are located in Missouri? *where appropriate.*
 - b. EPA listed four sources in neighboring states that may be impacting Missouri. How were these sources identified as impacting Missouri? Does the listing of these sources in Missouri's letter have any impact on future SIP requirements for Missouri, such as infrastructure SIP (good neighbor provisions)? *Within 20 mi. radius of source. Not at this time*
4. Could planned controls that are being installed to comply with MATS, CSAPR, or another federal requirement be considered in a state model when recommending boundary designations? *disagreement* *yes*
5. According to a January 2015 press release on KCP&L's website, two coal-fired units at their Sibley generating station, both greater than 5 MW, will cease burning coal by 2019. Does this mean that the Sibley generating station meets the definition of *Announced for Retirement* per the consent decree? If not, could a planned retirement that does not meet the definition of *Announced for Retirement* be considered in a state model when recommending boundary designations? *Not sure what it mean?*

Please let me know if you have any questions. Look forward to the call.

Thanks,

Emily Wilbur
State Implementation Plan Unit Chief
Air Pollution Control Program
(573) 751-4817 general
(573) 751-7725 direct line
(573) 751-2706 FAX

Promoting, Protecting and Enjoying our Natural Resources. Learn more at dnr.mo.gov.

*closing a source
auto close 2019.
for Sibley.*

*not included state enforceable, factually &
or when.*

*816-540-3161 central
Dr Griffith*

